

STATEMENT OF PROCEDURES  
ADOPTED BY NEW EDGE NETWORK, INC.  
d/b/a NEW EDGE NETWORKS

TO ENSURE COMPLIANCE WITH THE FEDERAL  
COMMUNICATIONS COMMISSION RULES AND REGULATIONS  
PERTAINING TO THE PROTECTION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

New Edge Network, Inc. d/b/a New Edge Networks (hereafter "the Company") has established operating procedures that ensure compliance with the Federal Communication Commission's ("Commission") rules and regulations regarding the protection of consumer proprietary network information ("CPNI") as stated in 47 CFR Ch. 1 § 64.2005.

The Company has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

The Company has implemented a process whereby it educates and trains its personnel, including sales agents, regarding the appropriate use of CPNI. Company has established disciplinary procedures should any of its personnel violate the CPNI procedures of the Company.

The Company has implemented a system whereby it maintains a record of its sales and marketing campaigns that use its customers' CPNI. Carrier has implemented a system whereby it maintains, for a minimum of one year, a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and/or services were offered as a part of the campaign.

The Company has established a supervisory review process regarding compliance with the CPNI rules and regulations with respect to outbound marketing situations and has implemented a system whereby it maintains records of carrier compliance for a minimum period of one year. Specifically, the Company has implemented a process whereby its sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding the use of its CPNI.

CERTIFICATION of CPNI FILING (February 24, 2009)  
OF  
NEW EDGE NETWORK, INC.

EB-06-TC-060  
EB DOCKET No. 06-36

I, Penny H. Bewick, Vice President – External Affairs of New Edge Network, Inc. (hereinafter "the Company") hereby certify, based on my personal knowledge, that the Company is in compliance with 47 CFR § 64.2009(e) "Safeguards Required for Use of Customer Proprietary Network Information." Such certification is based on and more specifically outlined in the accompanying Statement of Procedures.

Dated this 24th day of February, 2009.

  
Penny H. Bewick, Vice President

State of Washington )  
  )  
County of Clark        )

Subscribed and sworn to before me this 24th day of February, 2009.

  
Notary Public for Washington

My Commission Expires: May 5, 2012

